

REMARKS

Claims 10-14 are pending in this application, claims 9, 15, and 16 having been withdrawn pursuant to a requirement for restriction. Claims 11 and 13 have been amended for proper dependency and to respond to the claim objections. Because claims 12 and 14 depend from claim 9 they are provisionally withdrawn.

Claim 10 is amended to meet the rejection thereof under 35 U.S.C. 112, second paragraph.

Claims 10, 11, and 13 have been rejected under 35 U.S.C. 103 (a) as obvious over Maggenti et al. in view of Croker et al. and Bensimon et al.

Election/Restrictions

Applicant confirms the election for examination of claims 10, 11 and 13, which are directed to the invention of Species 2. That election is with traverse.

The restriction requirement is respectfully traversed for the following reasons: The claims of all three species are based on the same inventive concept, to wit: providing push-to-talk communication between groups of communication networks of different network operators.

- Elected independent claim 10 is directed to a method for push-to-talk communication between the members of an existing push-to-talk communication session within a first communication network operated by a first network operator and a group of an additional communication network operated by a second network operator.
- Withdrawn independent claim 9 is directed to a method for operating a push-to-talk communication between a push-to-talk group comprising at least one member of a first communication network, and a push-to-talk group comprising at least one member of a second communication network operated by a second network operator.

- Withdrawn independent claim 15 is directed to a system for push-to-talk communication between push-to-talk groups of at least two communication networks of different network operators.

Since independent claims 9, 10 and 15 are based on the same inventive concept of providing push-to-talk services between groups of communication networks of different network operators, examination of all three independent claims should not require different fields of search.

Claim Objections

The claim objections are met by the amendment of claims 10, 11, and 13.

Claim Rejections - 35 USC 112

The claim rejections under 35 U.S.C. 112, second paragraph, are met by the amendment of claim 10.

Claim Rejections - 35 USC 103

To the extent that the rejection of claims 10, 11, and 13 under 35 U.S.C. 103(a) as being unpatentable over Maggenti, in view of Crocker, and further in view of Bensimon is applicable to amended claims 10, 11, and 13, that rejection is respectfully traversed for at least the following reasons:

None of the three cited references is directed to a “method for push-to-talk communication between the members of an existing push-to-talk communication session within a first communication network operated by a first network operator, and a group of an additional communication network operated by a second network operator,” as recited in independent claim 10. Therefore, the method of claim 10 would not have been obvious in view of the combined disclosures of these three references.

Maggenti teaches communication between members of an existing communication session within only a single communication network.

The Examiner's assertion that Crocker teaches "a group of an *additional* communication network operated by a *second* network operator" (emphasis added) is not supported by the disclosure of Crocker. Crocker discloses only a single communication network operated by a single operator. It does not suggest communication between members of an existing communication session within one network and a group of another communication network.

The Examiner's assertion that Crocker teaches "identifying the ... application server of the additional group" is not supported by the disclosure of Crocker. Crocker discloses only a single communication network having a single application server 161. Crocker does not disclose an additional group having an application server to identify.

Please note that merely identifying an application server of an additional group still would not render obvious the identification step recited in claim 10 because that step specifies:

"identifying the PoC application server of the additional group by an address derived from a group address assigned to the existing groups of the session."

Crocker is not concerned with identifying an application server with a specific address, much less deriving such an identifying address from another address.

The Examiner has acknowledged that the "combination of Maggenti and Crocker does not teach 'connecting the additional group to each of the existing groups of the session and synchronizing the application server of the additional group to the previous application server.'" As pointed out above, the combination of Maggenti and Crocker does not teach either (a) connecting an additional group to an existing group of a session, or (b) identifying an application server of an additional group.

The Examiner's assertion that Bensimon teaches "connecting the additional group to each of the existing groups of the session and synchronizing the application server of the additional group to the previous application server" is not supported by the disclosure of Bensimon because:

- Bensimon's teaching is unrelated to connecting an additional communication network operated by a second network operator to an existing group of a session within a communication network operated by a first network operator; and
- the only synchronizing that Bensimon teaches is the synchronization of time slots allocated to different subscriber terminals that share a unique telephone number.

Regarding claim 11, Bensimon does not teach that the synchronization of the time slots is carried out automatically. In paragraph 0021, cited by the Examiner, Bensimon states that "each application server is synchronised with the synchronisation servers by sending a synchronisation message from the synchronisation servers to each application server." This does not satisfy the limitation of claim 11.

Regarding claim 13, Bensimon does not teach that "the synchronization is carried out whenever a user requests update of all group members of the ... groups before sending a ... message." Bensimon does not discuss updating synchronization whenever a user requests an update of all members of a group before sending a message. In paragraph 0023, cited by the Examiner, Bensimon merely discloses allocation by a synchronization server to a terminal of a data transmission time for exchanging data with an application server when the terminal is in a time slot where it is connected to a radiotelephony network and a data transmission time is requested by the terminal from the synchronization server.

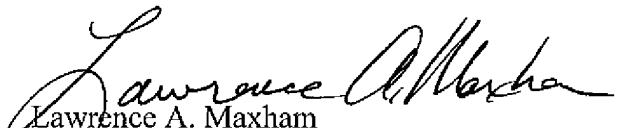
Claims 11 and 13, which depend from claim 10, are believed to be allowable for at least the same reasons as set forth above for the allowability of claim 10.

Conclusion

Applicants do not necessarily agree with any of the Examiner's comments regarding the applicability of the cited references to any of the claims. However, in view of the reasons presented herein for traversing the rejections of the claims, applicants are not presenting additional arguments at this time. Applicants reserve the right to present additional arguments for traversing the present and any future rejections of the claims.

Examination of claims 9, 12, and 14-16 and reconsideration of claims 10, 11, and 13 are respectfully requested.

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